

DOE, 2002

NFA Status Meeting Minutes
For January 31, 2002

ADMIN RECORD

SW-A-005931

1/3

MEETING MINUTES

Subject: NFA Status Meeting
Date: January 31, 2002
Time: 11:30 – 2:00 p.m.
Location: RFETS

I ER Update

ER RSOP – The State approved the document and DOE is working with EPA to close their remaining issue. Approval is expected in February.

Pathway Analysis – Kaiser – Hill is working on a pathway analysis to evaluate the subsurface.

Building 889 – The DOE lead is Lisa O'Mary and Elizabeth Pottorff is the State lead. The notification requires 30-days because it contains a RCRA unit.

Quarterly Letter – The draft letter was reviewed and edits made. The CDPHE took the lead to finalize the joint Agency letter and issue to DOE. PAC NE-1409 was further discussed. The Site referenced published action levels from Appendix 5 of RFCA in a previous write-up. It appears the value in RFCA may be incorrect for methylene chloride. Carl took the action to verify the correct value with Laura Brooks. The discrepancy does not affect the NFA determination agreed to for this PAC. The Quarterly letter will not contain a corrected value. If an error exists, Attachment 5 to RFCA will need to be amended. In the meantime, other Site documents are consistent with the existing RFCA values.

RCRA Units – Kaiser – Hill provided the State with a spreadsheet containing the requested information on PACs that contain RCRA Units. Laura Brooks and Susan Serreze will be invited to the March Meeting to discuss the list.

II Correction of Prior Meeting' Minutes

The minutes were approved and signed as written (a typo was lined out in the first sentence of Section IV).

III NFA Discussions

- (A) There were four sites carried over from the 1992 list, 700-1110, 900-1300, SE-1600 and SE-1601. These were deferred to the February meeting.
- (B) The two East Spray Field IHSS's (216.2 and 216.3) from the 1997 HRR were discussed. The EPA stated they could not concur with the recommendation for NFA at these locations. They need to be sure the Site has actual data from the AOC; not just from the area adjacent to the AOC. Gary stated there was a lot of run-off from the spraying and he wants to ensure adequate characterization in locations where sediments may have accumulated from the run-off. Additional biased sampling in accordance with the BZ SAP must be performed. Gary requested to walk the AOC and designate biased sampling locations. The State said no further sampling for groundwater is required based on review of the existing downgradient monitoring wells.
- (C) Kaiser – Hill provided additional information for two of the three remaining sites from the 2001 HRR as previously requested. It was concurred with that PAC 600-189 was an NFA site. Kaiser – Hill was unable to adequately answer the questions regarding PCOCs associated with PAC 300-206. After reviewing the OU 10 Workplan, further information will be provided at the next meeting. The remaining PAC (700-1102) could possibly go as NFAs once a revised write-up is provided by Kaiser - Hill.
- (D) The remaining site (NW-1504) associated with the Present Landfill from the 7th Quarterly Update was reviewed and accepted as an NFA site. Additional data had been provided at the previous meeting for Agency review.

- (E) New discussion occurred regarding the six remaining sites from the 7th Quarterly Update. Four of the sites were agreed to as NFAs (PACs NE-1410, 000-503, 300-711 and 300-712). Kaiser - Hill was unable to locate the write-up for PAC 100-613, hence it was deferred to the next meeting. The agencies requested additional information for the last site, PAC NE-1411, at least equivalent to that provided for NE-1410, or demonstrate that the area of the spill was part of the previously completed east trench area remediations.
- (F) The 18 Transformer Sites from the 1996 HRR were discussed in general. Per RFCA, using the existing ALF, the sites meet the NFA criteria. The concern was raised that once subsurface RSALs are determined, the status may change. The clean-up work was done under TSCA via an approved PAM. This does not however pre-empt clean-up under other authorities. RFCA may be the ultimate authority and if a risk based number is more conservative, it may end up being applied. PCB-like-dioxins would possibly need to be evaluated based on yet to be promulgated EPA guidance if TSCA is applied, which are orders of magnitude lower than those for PCBs. The State and EPA requested we table the discussion until they could evaluate the issues further.

IV List of NFA's for Next Meeting

The State will complete its' review of the final four locations from the 1992 list (PACs 700-1110, 900-1300, SE-1600 and SE-1601)

Kaiser - Hill will present the requested data for the two remaining sites from the 2001 HRR (PACs 300-206 and 700-1102) and discuss as appropriate.

Kaiser - Hill will provide the write-up for Agency review for PAC 100-613 and additional information as requested for NE-1411 from the 7th HRR Quarterly Update.

The new write-up for PAC (700-1102) from the 2001 HRR Update will be provided by Kaiser - Hill.

The new locations for review includes PAC NW-170 from the 1999 Annual Update; PAC NE-1404 from the 1998 Annual Update; four remaining PACs from the 1997 Annual Update (PACs 300-212, 700-1114a, 700-1114b and 900-109); PAC 500-908 from the 12th Quarterly Update; and PACs 700-113, 900-1315 and 900-1317 from the 11th Quarterly Update.

Since the transformer sites are being tabled, I would like to add the following five sites to the list for the next meeting. They include: PACs 300-714 and 900-1316 from the 10th Quarterly Update; PAC 900-1314 from the 9th Quarterly Update; and PACs 300-713 and 400-814 from the 8th Quarterly Update. This will complete the list of sites currently proposed by the Site as NFAs.

(See attached February 27, Agenda for a concise listing of the sites requiring review prior to the meeting.)

V Closing

The next meeting will be February 27, 2002, at 10:00 a.m. in B060/Rm 114.

CONCURRENCE:

DOE

EPA

CDPHE